



Code of Conduct

# Doing the right thing

## Code of Conduct

# Doing the right thing

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## Message from our Chief Executive

We are passionate about our role in society and are committed to the idea that what we do makes a real difference to people's lives.

We believe in doing the right thing by our stakeholders, creating greater social value from our activities.

We achieve this by living our values; delivering excellence for our clients and the community; being passionate about our role in providing vital services; putting integrity at the heart of our business by acting in a fair, ethical and transparent manner; and collaborating with our partners to deliver lasting change.

Our Code of Conduct is crucial to this. It sets out the strong ethical standards we adhere to as ambassadors of Galliford Try and provides a framework to ensure we always behave in a way that reflects our values.

It is only by following our Code of Conduct that we can achieve our vision. I, therefore, encourage you all to read and understand our Code of Conduct and know what is expected of all of us at Galliford Try.

If you are ever in doubt, please contact management or the teams listed within this Code, and always speak up and raise your concerns if you see or suspect wrongdoing. We are committed to listening to you and providing our support.

We will deal with any issues confidentially, standing together to make sure we are always doing the right thing.

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*“It is only by following our Code of Conduct that we can achieve our vision to be a people-orientated, progressive business, driven by our values to deliver lasting change for our stakeholders and the communities we work in”*

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A handwritten signature in black ink, appearing to read 'Bill Hocking'.

Bill Hocking



# Introduction

“

It takes 20 years to build a reputation and five minutes to ruin it. If you think about that, you'll do things differently.”

Warren Buffett, businessman

## What is the Code?

Our Code of Conduct consists of standards and principles that set out how we work and what we value. It provides a framework for every individual at Galliford Try, and those who work with us, to ensure everything we do is in line with our values, legally compliant and ethically acceptable. As reinforced by our vision and values, we strive to achieve excellence as a business and always act with integrity, and in an honest and fair way.

## Who does the Code apply to?

### Our employees

The Code of Conduct applies to everyone at Galliford Try. Drawing on our policies, it reminds us of how we work and provides guidance on our approach to areas that matter to us as a business.

It is important that everyone at Galliford Try reads and understands the Code and uses the principles outlined within it in everyday life, particularly if faced with ethical dilemmas. Failing to comply with this Code or Galliford Try's policies could have severe consequences for the Group and its people, and could result in disciplinary or legal action.

### Our leaders

Our leaders set an example to others, demonstrating the highest levels of integrity. If you manage a team, you should ensure your team is aware of and understands the Code, and

provide them with the support and advice required to apply the Code and uphold its intent. Individuals should also be given guidance on how they can raise a concern about suspected breaches of the Code, in addition to how such matters are dealt with by the Group.

### Our supply chain partners

We have high standards of working practice and ask those working on our behalf to share our values and follow our principles and practices.

*“We never tolerate any illegal or unethical activity”*

### How to do the right thing

If you ever find yourself in a situation where you are unsure about how you should behave, ask yourself the following questions:

- Is it legal?
- Does it align with our values?
- What are the consequences of it?
- Am I comfortable with it?

### Raising concerns

Our duty to do the right thing extends to speaking up when we see things are wrong.

If you see or suspect a breach or potential breach of the Code, please report it to your line manager/supervisor or by using the Group's confidential whistleblowing procedure (page 41).

# Our vision and values

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Our vision is to be a people-orientated, progressive business, driven by our values to deliver lasting change for our stakeholders and the communities we work in.

## How we work

Our vision is to be a people-orientated, progressive business, driven by our values to deliver lasting change for our stakeholders and the communities we work in, and our values are Excellence, Passion, Integrity and Collaboration. These values encourage us to work ethically and to the best of our abilities, shaping our approach to day-to-day activities and helping us to achieve our business goals, while being good corporate citizens.

Our vision and values shape our culture of doing the right thing.

### Excellence

Striving to deliver the best.

### Passion

Committed and enthusiastic in all we do.

### Integrity

Demonstrating strong ethical standards with openness and honesty.

### Collaboration

Dedicated to working together to achieve results.



Our responsibilities to

# ourselves and our colleagues

“

Integrity is doing the  
right thing, even when  
no one is watching.”

CS Lewis, novelist

# Prioritising health, safety and wellbeing

We are committed to prioritising the health, safety and wellbeing of our people, and of those around us. Our fundamental belief is that everyone has the right to return home safely at the end of each working day and we promote personal wellbeing.

## What it means

We are committed to effectively managing all aspects of health, safety and wellbeing and have robust systems and processes to comply with statutory requirements.

We drive improvement in health, safety and wellbeing by creating a culture of care and openness as defined by our Challenging Beliefs, Affecting Behaviour programme.

## We always

- Work to be industry-leading in health and safety, believing that nothing we do is so important that we cannot take the time and effort to do it safely.
- Follow the principles of Challenging Beliefs, Affecting Behaviour, creating and maintaining an environment where care for our people and those who work with us is our top priority.
- Promote wellbeing, using *Be Well* as a guide.
- Minimise the risk of injury or ill health and prevent unsafe working practices and conditions.
- Use the correct PPE (Personal Protective Equipment) required for the task we are performing.
- Alert a supervisor or manager if we see unsafe behaviours and intervene if we see something unsafe or hazardous if it is safe to do so.
- Know what to do if there is an emergency.
- Report to work in a fit state to carry out our duties, free from the influence of alcohol, illegal drugs or other impairing substances.
- Remain aware that random testing for drugs and alcohol is carried out by the Group and anyone found to be in breach of our policies will be removed from the workplace and could be dismissed.

- Lead by example, embracing our vision and values.
- Ensure we understand and comply with all relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

## We never

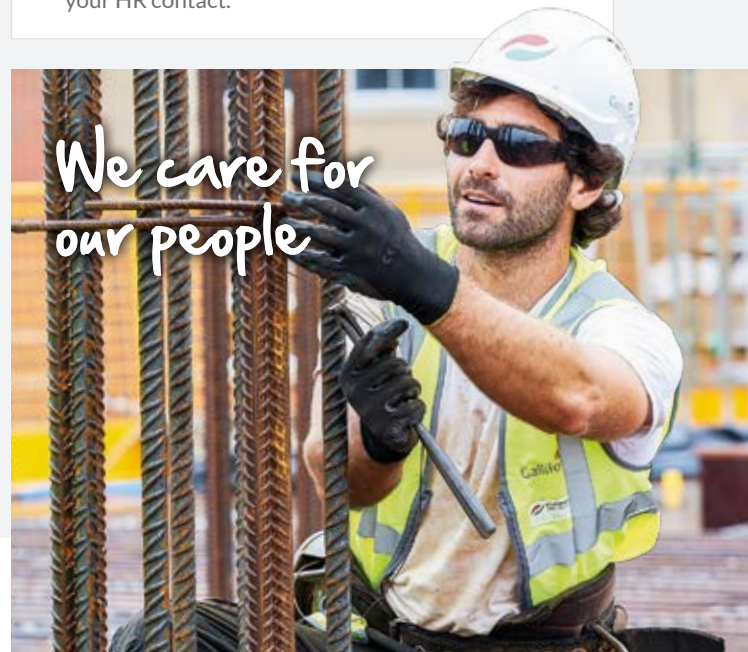
- Carry out tasks we are not fit, trained or qualified to perform.
- Accept the idea that our work is inherently dangerous and accidents cannot be avoided.
- Condone or walk by unsafe practices.

## How can I find out more?



- Review the process and policies set out in our BMS.
- Download the 'CBAB' app.
- Download a copy of *Be Well*.
- Speak to the Health, Safety and Environment team or your HR contact.

We care for  
our people



Our responsibilities to ourselves and our colleagues

## Respecting human rights

We are committed to upholding human rights for our people and those who work with us, and we take steps to prevent slavery and human trafficking from taking place in our business and supply chain.

### What it means

We firmly believe in treating people with dignity and respect, and creating a safe environment for them to work within, in compliance with the law. We recognise that the key human rights areas our industry could be affected by are modern slavery and human trafficking among directly-hired employees, agency workers, subcontractor operatives and our supply chain.

We respect all human rights and are committed to taking appropriate and proportionate steps specifically to mitigate the risk of these violations occurring within our business and our supply chain.

#### How can I find out more?



- Review the process and policies set out in our BMS.
- Speak to the Legal or HR teams.

### We always

- Prohibit the use of forced labour.
- Verify that all employees have the right to work in the UK when they start their employment.
- Make all employees aware of their working hours, leave and absence entitlements and other employment benefits.
- Comply with minimum wage and minimum age requirements.
- Aim only to engage with suppliers who have procedures in place to minimise the risk of recruiting forced or compulsory labour.
- Work with subcontractors who share our values.
- Lead by example, embracing our vision and values.
- Ensure we understand and comply with all relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

### We never

- Employ people on a forced or compulsory basis or use child labour.
- Exploit our people or those who work with us.

Dignity, fairness, respect and equality



## Spotting the signs of modern slavery

Modern slavery is a serious issue encompassing slavery, servitude, forced or compulsory labour and human trafficking. Generally, a victim of modern slavery may:

- Look uneasy, unkempt or malnourished.
- Appear to be in the control of someone else.
- Be unsure of their personal address.
- Have a lack of personal belongings.
- Wear the same clothes every day or wear unsuitable clothes for work.
- Be reluctant to talk to others.
- Appear frightened, withdrawn or show signs of physical or psychological abuse.
- Be dropped off and collected for work, especially at unusual times.

Our responsibilities to ourselves and our colleagues

## Treating people fairly and respectfully

We are an equal opportunities employer and we enjoy, promote and value a diverse workforce. We operate an inclusive environment where everyone has an equal opportunity to achieve their potential. We do not accept any form of discrimination against our colleagues or those we work with.



There is always time to do the right thing

### What is bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour. It can be an abuse or misuse of power which makes the recipient feel vulnerable, upset, humiliated or threatened. It can take many forms including derogatory remarks, insensitive jokes or pranks, insulting or aggressive behaviour, shouting, swearing, ignoring or excluding people, making unreasonable requests, setting unrealistic deadlines or setting someone up for failure. It can be physical, verbal or non-verbal.

### What is harassment?

Harassment involves subjecting someone to unwanted conduct, which has the purpose or effect of violating their dignity or creating an environment that is intimidating, hostile, degrading, humiliating, embarrassing or offensive to them. This can include unwanted physical contact, unwanted verbal conduct and unwanted non-verbal conduct.



## What it means

We draw on a diverse range of skills and talents to be the successful company we are and firmly believe that every employee is entitled to an equal right to opportunities. We enjoy and value our diversity and promote equality and respect for all. No individual or potential candidate receives more or less favourable treatment based on their age, race, colour, religion, beliefs, nationality, national origin, ethnicity, gender, sexual orientation, marital or civil partnership status, disability, pregnancy or maternity, responsibility for dependants, political or personal convictions, membership of trade unions, or any other attribute or quality. We do not tolerate harassment or bullying on any grounds and act respectfully towards all.

## We always

- Respect people's differences and treat everyone with dignity and respect.
- Create an inclusive culture in which everyone feels valued as an individual and is motivated to give their best in their job.
- Provide equality of opportunity to all current and potential employees across the employment cycle and treat individuals in a fair and consistent manner.
- Ensure the people we recruit share the same values, behaviours and attitudes as our business.
- Appoint, promote and reward people based on merit.
- Support every individual to achieve their potential.
- Ensure we understand and comply with all relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

## We never

- Accept or encourage discrimination or treat anyone more or less favourably than another based on the characteristics described above.
- Make unwelcome advances on other individuals.
- Victimise individuals or groups.
- Behave in a way that is, or could be perceived as, unwelcome, malicious, offensive, discriminatory, intimidating or derogatory, or share inappropriate jokes or offensive material.

**Q** The business has agreed to allow me to work flexible hours due to my out-of-work commitments. A colleague is remarking on this sometimes by way of a joke and sometimes with contempt. What should I do?

**A** We fully support agile working at Galliford Try and everyone has the opportunity to request arrangements that work for them. Any unwanted remark your colleague is making should come to an end. If you feel you can, speak to your colleague in the first instance to explain the comments are unwanted. If it continues, liaise with your line manager/supervisor or HR.

**Q** Should I avoid paying my colleagues compliments?

**A** Gender, age, sex and other factors such as this should not have a bearing on a workplace compliment. Provided the compliment doesn't cover these areas, shows respect and doesn't make the subject or others who are present feel uncomfortable, it is fine. If you are unsure your compliment meets these criteria, it should not be given.

## How can I find out more?



- Undertake our online diversity and discrimination training modules.
- Review the process and policies set out in our BMS.

Our responsibilities to ourselves and our colleagues

## Avoiding conflicts of interest

We make decisions that represent the best interests of the company by avoiding situations where our personal circumstances may conflict with the Group's. We declare conflicts of interest when they arise.

Wisdom is knowing the  
integrity is taking it

### What it means

A conflict of interest is a situation where an individual or organisation has competing or multiple interests (be they personal, business or financial) and serving one interest could work against another. If a conflict of interest arises, we notify our manager as soon as we become aware of it.

#### How can I find out more?



- Review the process and policies set out in our BMS.
- Speak to your line manager/supervisor or HR contact.
- Speak to the Company Secretariat team.

### We always

- Avoid direct and indirect conflicts between our personal interests and those of the Group, its customers, suppliers and other stakeholders. We avoid situations where our motives could be questioned.
- Disclose potential conflicts of interest immediately, recording them on the appropriate conflicts of interest register if required.
- Disclose to our line manager/supervisor if we know someone who holds influence in an organisation we are working with.
- Declare any interests we have in other organisations.
- Gain prior consent from the business to take part in any employment or business venture outside of our employment with the Group.
- Lead by example, embracing our vision and values.
- Ensure we understand and comply with all relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.



# right path,

## We never

- Inappropriately use our position, contacts or knowledge gained in a business context for personal profit or benefit, or to benefit friends, family or associates.
- Encourage the company to engage an individual or supplier who we know personally, unless it has been approved.
- Accept gifts or hospitality that either affect objectivity or impair our judgment, or that could be perceived to do so (page 20).
- Have any direct or indirect personal financial interest in any business with which the Group has dealings, unless that interest is fully disclosed and approved in writing by a business unit managing director or divisional managing director. (Holding five per cent or less in the shares of a company held as investment is an exception.)
- Use the resources of the Group for private or non-Group purposes without specific permission.
- Make political contributions, including non-cash contributions such as the use of the Group's facilities, services or employee time.

**Q** Can I appoint or place an order with a subcontractor or vendor I know personally?

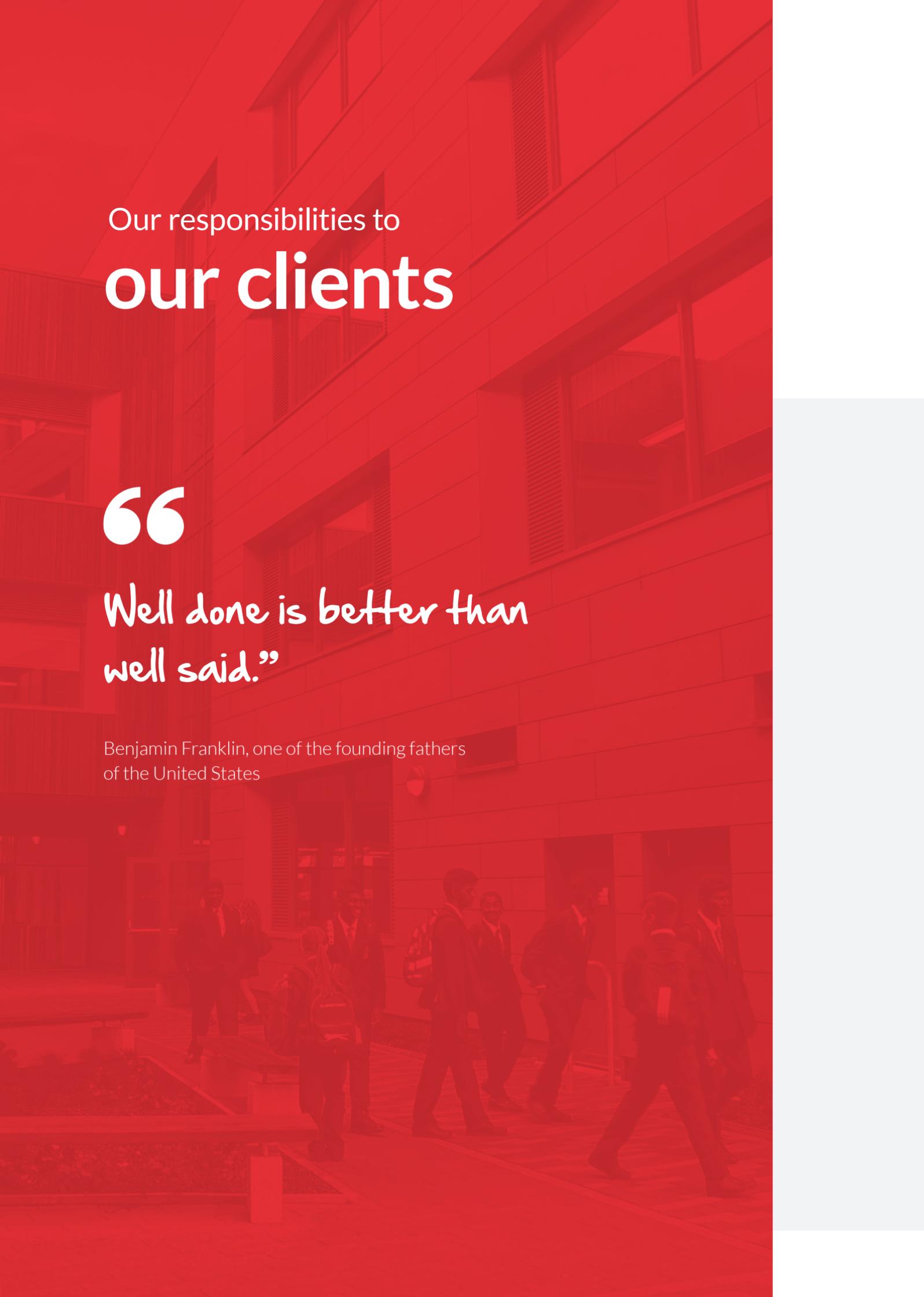
**A** You cannot use your position in the company to the advantage of someone you know and so the most important thing to do is formally disclose this relationship to the relevant member of the Executive Board as soon as possible, so a decision can be made as to whether there is a conflict. The idea is to be transparent in what we do and always work with integrity, honesty and fairness.

**Q** Can someone I have a close relationship with apply for a job with us?

**A** As long as you believe the individual has the skills, qualifications and personal attributes required for the role then they may apply for the role, provided that you are not in a position to influence the decision to employ them and that you will not be their manager. You should also ensure you disclose your relationship when recommending the individual for the role to avoid any misconceptions.

## Common examples of conflicts of interest

- Nepotism – giving preferential treatment to relatives and close friends, often by hiring them.
- Self-dealing – when someone takes advantage of their position in an organisation and acts in their personal interest rather than that of the body they represent.
- Gifts and hospitality – care should be taken to ensure this exchange is not inappropriate (page 20).
- Outside employment – other employment or activity that is detrimental to the commercial interests of the Company or can impact an employee's ability to effectively discharge their duties and obligations.



Our responsibilities to  
**our clients**

“

Well done is better than  
well said.”

Benjamin Franklin, one of the founding fathers  
of the United States

## Quality and customer service

We give total commitment to all of our clients and exhibit professionalism and integrity, working to the highest standards possible. We work in partnership to deliver high-quality, sustainable solutions.

### What it means

Providing our customers with high-quality solutions and outstanding service is key to the success of our business. We believe in demonstrating transparency, openness, honesty and, above all, demonstrating our values of Excellence, Passion, Integrity and Collaboration. It is only by working to these standards, and with these values, that our business can thrive.

### We always

- Earn the trust and confidence of our clients.
- Do what we say we will do and endeavour to keep our promises.
- Communicate honestly and transparently and encourage feedback to enable continuous improvement.
- Work with professionalism, demonstrate competence and add value where we can.
- Provide the highest standards of customer service by following our customer satisfaction processes.
- Seek to develop long-lasting, value-adding relationships.
- Aim to resolve potential issues amicably as early as possible.
- Act respectfully and with integrity. Never include in an email what you wouldn't want to be heard.
- Lead by example, embracing our vision and values.
- Ensure we understand and comply with all relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

### We never

- Knowingly neglect or breach contractual agreements.
- Act unprofessionally, dishonestly or unfairly.
- Ignore customer feedback or fail to act on it.



### How can I find out more?



- Review the process and policies set out in our BMS.

Our responsibilities to our customers

## Anti-bribery and corruption

We never offer or accept bribes, inducements or rewards in any form and refuse to participate in corrupt activity. We report offers and requests of bribes and corrupt activity immediately.

### What it means

We define bribery as the act of offering, giving, requesting or receiving money, goods or any form of advantage in exchange for an alteration of behaviour. This includes gifts, hospitality and the offer of employment, and does not need to benefit an individual personally. Corruption is illegal, dishonest or fraudulent conduct by those in positions of power or authority. It can include bribery, blackmail, money laundering, deception, extortion and collusion.

Bribery and corruption are serious offences and anyone offering, giving, requesting or taking bribes, or exhibiting corrupt behaviour, will be subject to disciplinary action which is likely to result in dismissal and potentially prosecution.

Facilitation payments are payments or other benefits paid to officials to encourage them to do something which they were going to do – such as issue a permit or visa – sooner than they otherwise would have done. These are also considered bribes and are prohibited.

We have a zero tolerance approach to bribes, corruption and fraud of all kinds.

### We always

- Use appropriate caution when accepting or offering gifts, entertainment and hospitality and follow the rules with respect to pre-authorisation and declaration.
- Declare hospitality or gifts given or received.
- Lead by example, embracing our vision and values.

- Ensure we understand and comply with all relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

### We never

- Offer or make payments (or other favours) to someone if we suspect that it could influence them to misuse their position.
- Misuse our positions in connection with payments (or other favours) for ourselves or others.
- Make political donations.
- Make charitable donations on behalf of the company without authorisation.
- Offer or give financial or other advantages to foreign public officials to seek business gain.
- Allow or give consent to others to do any of the above.

#### How can I find out more?



- Undertake our online anti-bribery training module.
- Review the process and policies set out in our BMS.
- Speak to the Legal team.

Ask yourself if you feel comfortable with it

**Q  
A**

**When we are involved in a tendering process, are there any corruption risks?**

Yes. Some examples of warning signs include:

- Any price-fixing or anti-competitive practices.
- Bribery to obtain a contract award.
- Bribery during sub-contract procurement.
- Corruptly negotiated contracts.
- Manipulation of design specifications due to corruption.
- Specification of overly sophisticated design.
- Inflation of resources and time requirements outside of normal, prudent contingencies.
- Improperly obtaining information on rival bids.
- Obtaining a quotation only to give the appearance of price comparison.
- Concealment of financial status of a counter-party.
- Submission of false quotations.

**Q  
A**

**Can corruption occur during the execution phase of a project?**

Yes, warning signs can include:

- False invoicing, such as for the supply of inferior materials or fewer quantities.
- False work certificates.
- Excessive repair work.
- Overstating man-day requirements.
- Inflated claims for variation.
- False variation claims.
- False extension of time applications or certificates.
- False assurance that payment will be made.
- Delayed issue of payment certificates.
- Set-off of false rectification costs.
- Refusal to issue final certificate.
- Requirement to accept lower payment than is due.
- Facilitation payments.
- Overstating of profits.
- False job applications.

## General rules on the prevention of bribery

- Do not offer or make payments (or other favours) to someone if you suspect that this could influence them to misuse their position.
- Do not misuse or offer to misuse your position in connection with payments (or other favours) for yourself or others.
- Do not offer or give financial or other advantages to foreign public officials to seek business gain.
- Do not allow others to do any of the above, to 'connive' or to 'consent' to such activities.



Our responsibilities to our customers

## Exchanging gifts and entertainment

We take care to ensure the gifts and hospitality we receive are within reasonable limits. We never allow them to influence our decisions and we never offer or accept gifts or hospitality that could be construed as excessive or as a bribe.

### What it means

Entertainment and hospitality can include attendance at social events, functions, sports matches, theatres or other occasions such as business lunches or dinners, whether they include a business purpose or not, and whether received or offered.

Gifts include any token of appreciation and gratitude, gift vouchers, physical gifts or other items of value – again, whether received or offered.

Exchanging gifts and hospitality can build goodwill and, in most cases, reasonable ordinary levels of hospitality intended to foster cordial business relationships are acceptable under the Code and the law. Caution must be exercised, however, and anything seen to be 'lavish' or 'excessive', or anything that could lead to questioning the motive of the action, should not be accepted or offered.

### We always

- Take care to ensure gifts and hospitality, both given and received, are reasonable and within Group guidelines.
- Accurately record and disclose the exchange of gifts and

hospitality, following the pre-approvals process.

- Ensure corporate hospitality always includes representatives of the company to which we are giving or from which we are receiving the hospitality.
- Lead by example, embracing our vision and values.
- Ensure we understand and comply with all relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

### We never

- Accept or offer gifts or hospitality if they could be seen to influence decisions or create preferential treatment or a sense of obligation.
- Accept or offer gifts or hospitality that prejudice, or could be seen to prejudice, our integrity or impartiality.
- Give or receive cash, a cash equivalent or gift vouchers to or from a third party – whatever the reason.
- Encourage or allow third parties to contribute to company or internal social events.
- Make political donations.





### How can I find out more?



- Review the process and policies set out in our BMS.
- Speak to the Legal team.

**Q** I have become friends with a supplier who has now connected with me on social media and invites me to their personal events including birthdays and now their wedding. Can I attend?

**A** This should be declared under the conflicts of interest and hospitality guidance. Responsibility for that supplier's procurement should be handed over to a colleague or the invitations should be declined.

**Q** Our team made a contribution to a client event that was intended as a treat for their staff. No one from Galliford Try attended. Is this in breach of the Code and would it be different if it was a charity event?

**A** Yes, it is a breach in both scenarios unless, in the case of a charity event, it takes the form of a Galliford Try sponsorship authorised by the company. The event would need to be attended by representatives from Galliford Try. This event could be construed as falling outside normal business practice to promote cordial relationships between Galliford Try and our clients, so it would be a potential corruption concern.

Our responsibilities to our customers

## Fraud, deception and dishonesty

We will never initiate, engage in or condone any form of fraudulent, deceptive or dishonest behaviour and are committed to operating in an open, honest and ethical manner.

### What it means

Fraud is a type of criminal activity in which someone uses deception or dishonesty for their own gain or to cause a loss to another party. It can include deception by false representation, false accounting, forgery, failing to disclose information and abuse of position. Making false claims also qualifies as fraud. This can include inflating claims as well as claiming for things we are not entitled to claim.

We operate with integrity and none of our working relationships with clients, suppliers or partners should be tainted with fraudulent or dishonest conduct.

### We always

- Work in an open, honest and ethical manner.
- Comply with the contract terms for any project.
- Keep accurate and complete records and accounts in relation to work and expenses.
- Diligently check invoices, contracts and other official documents.
- Lead by example, embracing our vision and values.
- Ensure we understand and comply with all relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

### We never

- Alter figures, letterheads, dates or information on documents in a way that could mislead.
- Mislead people we do business with or cause them to be misled by our actions or omissions.
- Proceed with transactions where we have concerns or suspicions about criminal activity.
- Record costs against different codes or projects in order to conceal or suppress actual costs.

### Identifying fraud

Sometimes the way other people behave can cause us to be concerned about fraudulent conduct. Below are some warning signs that may indicate potential fraudulent activity:

- Significant and unexplained changes in behaviour.
- Transactions that take place at an unexpected time, are unusual in frequency or amount, or involve unexpected recipients.
- Internal controls not being properly enforced or being overridden.
- Discrepancies in accounting records, purchase orders or invoices, or unexplained items appearing in reconciliations.
- Missing documents, or only photocopied documents are available when an original is required.
- Inconsistent, vague or implausible responses to enquiries.
- Discrepancies between paperwork and verbal explanations.
- Missing inventories of physical assets.
- Excessive voids or credits.
- Alterations or other unusual inaccuracies in documents.
- A person appears to exercise excessive control of a process from start to finish, with no segregation of duties.
- A person is resistant to others taking over, seeing their work, or avoids taking time off.

### How can I find out more?



- Review the process and policies set out in our BMS.
- Speak to the Legal team.



**Q** Is it ok to transfer costs between project codes to 'level-up' loss-making projects and projects which have some headroom?

**A** No, this is fraudulent as you are misrepresenting financial data with the intent to deceive. While the overall cost may equate to the same thing, you are deliberately recording inaccurate data and giving an untrue reflection of the commercial performance of a project.

Where does your moral compass point?



**Q** I am trying to recover costs from a client but obtaining the documentary evidence of the costs from a supplier is proving awkward. Can I alter an invoice to make it look like the costs are recorded on it, say by changing letterheads, site addresses, descriptions of work performed or rates and totals on existing invoices? While I'd be amending some details, the costs would be the same.

**A** Regardless of the end outcome of coming to the same cost, this practice is fraudulent as you are falsifying documents. Behaving in this way is a criminal offence. Instead, you should contact the supplier and request they provide you with the information you need. If this proves difficult, remind them that they have a responsibility to provide us with accurate documentation.

Our responsibilities to our customers

## Ensuring fair and open competition

We fully support free and open competition and do not condone any activity which might unfairly restrict the level of competition expected by clients, partners and subcontractors.

### What it means

We believe in open and free competition and refuse to enter into any understanding or agreement with a competitor, supplier or client with the purpose or effect of influencing the price or restricting the availability of any service that the Group or the competitor provides for any third party. We do not partake in bid rigging, price-fixing, market sharing, cover pricing or solicit information in competitors' bids. We do not condone blacklisting.

We always gain information in a way that is legal, honest and fair, and never use or share information that has been solicited or obtained by inappropriate means, or could be perceived to have been gained unethically.

Anti-competitive behaviour is likely to be a criminal offence, which could result in fines and imprisonment.

### We always

- Bid contracts and tenders independently from and without any agreement or arrangement with our competitors.
- Exercise appropriate care when working with competitors (for example when working as part of joint ventures and framework agreements).
- Agree – when collaborating with third parties – to restrict the use of commercial information to the purposes of that framework or joint venture, unless previously agreed by the Legal team.
- Inform others that confidential commercial matters that could affect competition cannot be discussed in our presence at trade meetings. If such discussions continue, we leave and request our departure is minuted.
- Treat competitively sensitive data such as current or future pricing agreements and intentions as confidential.
- Ensure we have the appropriate training to carry out day-to-day business activities within the scope of the law.

- Register face-to-face meetings with MSPs or the Scottish Government's Ministers, Special Advisers or Permanent Secretary in line with the Lobbying Act (Scotland) 2016.
- Lead by example, embracing our vision and values.
- Ensure we understand and comply with all relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

### We never

- Discuss prices, discounts, rebates, market share, sales prices, investments, or terms and conditions relating to delivery terms or warranties with a competitor.
- Initiate, engage in or condone bid rigging, price-fixing, market sharing, blacklisting, cover pricing or solicit information in competitor's bids.
- Enter into agreements or understandings with our competitors or other parties that restrict competition.
- Obtain information by illegal means.

### How can I find out more?



- Undertake our online Competition Act training module.
- Review the process and policies set out in our BMS.
- Speak to the Legal team.



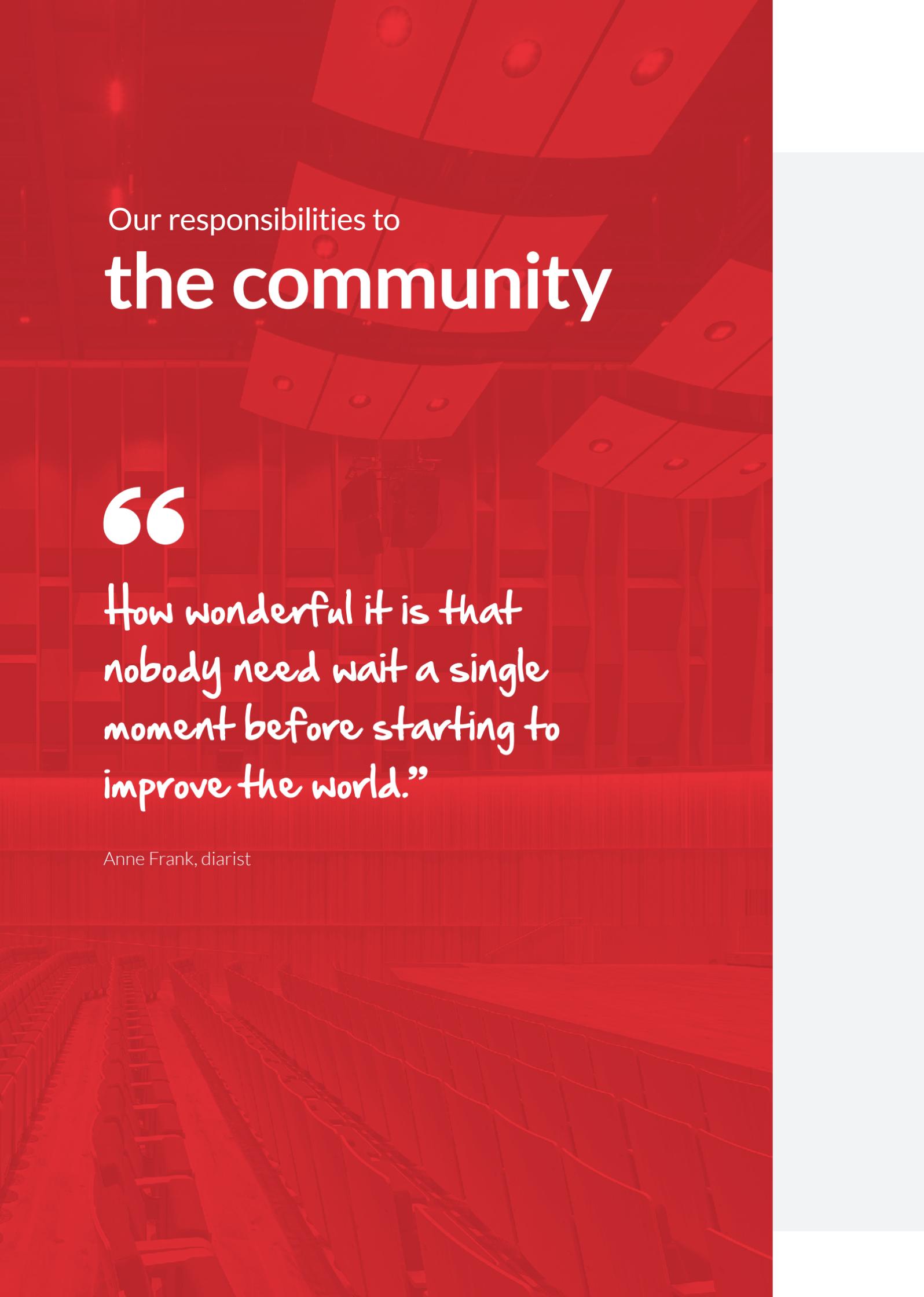


**Q** We are discussing whether to approach a company which might otherwise be a competitor on a tender to form a joint venture to bid. It is suggested that this will benefit our chances of winning the contract rather than bidding against them. We can also gain knowledge of commercial matters to strengthen our position in future bids. Should I be concerned?

**A** Yes. It is a breach of competition law to seek to reduce competition or to exchange commercial information, whether prices or any other valuable information. The only legal grounds for bidding in joint venture is to acquire necessary capacity or expertise, or to manage and spread risk as compared to bidding alone. Commercial information must be ring-fenced and not used outside the joint venture project, which is covered by the Competition Law Compliance Protocol that we sign with joint venture partners.

**Q** I have been invited by a client to attend a sports event. It is likely that some of Galliford Try's competitors will be present. Can I attend?

**A** Yes, it is acceptable to attend but exercise caution about what you discuss with our competitors. General discussions and expressions of opinion concerning market outlook or conditions affecting subcontractors, suppliers or customers are permissible, provided they would not influence the future conduct of the competitor company. Discussions regarding health and safety issues and potential future legislation or regulation are also fine. However, you should avoid discussing matters which could be of any commercial benefit to competitors.



Our responsibilities to  
**the community**

“

How wonderful it is that  
nobody need wait a single  
moment before starting to  
improve the world.”

Anne Frank, diarist

## Being a good neighbour

We seek to make a positive impact in the communities in which we work and behave in a socially responsible manner, improving the image of our industry. We treat all of our stakeholders with respect, courtesy and consideration, even when we are away from work.

### What it means

We represent our business and always live up to our values, behaving with pride and integrity, and demonstrating excellence and collaboration. We believe in maximising the positive impact of our operations through active engagement with the local community and assessing and addressing our impacts in relation to them. On our construction projects we do this by consulting with our stakeholders to understand and address their needs, following the principles of the Considerate Constructors Scheme (CCS). We often support local causes to make a positive impact in our communities. We always take care of our responsibilities when deciding to support an organisation on the Group's behalf and we record our efforts to allow us to demonstrate our commitment and promote the excellent work that we do.

### We always

- Take pride in what we do and take care to protect the Group's reputation and future.
- Treat the public with courtesy and consideration, respecting the culture and customs of the communities we are working within.
- Strive to resolve disputes amicably.
- Seek opportunities to support charitable donations that fit with our company values and beliefs.
- Record charitable giving appropriately.
- Use social media with care, following the business' guidance.
- Refer calls from the press to the Communications team.
- Lead by example, embracing our vision and values.
- Ensure we understand and comply with all relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

### We never

- Treat people in a way we would not want to be treated ourselves.
- Behave in a way that could negatively impact the Group's reputation.
- Disclose confidential information about the Group.
- Knowingly allow charitable donations to mask corrupt or fraudulent activity.
- Make charitable donations if we believe they could be construed as improperly influencing another party with whom Galliford Try has a business relationship.

#### Volunteering policy

Volunteering for a good cause is a great way to make a positive impact. The Group therefore offers all employees up to two paid days of volunteering time each year. Visit the intranet for further details.

#### How can I find out more?



- Visit the intranet for guidance on our policies.



An aerial photograph of a river winding through a dense forest, with a road and some buildings visible in the distance. The image is overlaid with a semi-transparent red filter.

# Our responsibilities to the environment

“

We ourselves feel that what we are doing is just a drop in the ocean. But the ocean would be less because of that missing drop.”

Mother Teresa, missionary

# Protecting the environment

We aim to protect the environment and plan for its improvement, and are committed to a policy of managing our environmental performance to minimise the impact of our business processes on the natural environment.

## What it means

We acknowledge that environmental protection and climate change are among the greatest challenges we face, both as a society and a business. We recognise that we have a key part to play through minimising the environmental impact and carbon footprint of our operations to ensure the long-term sustainability of the products and services we provide.

## We always

- Assess the environmental impact of what we are doing and incorporate sustainable environmental solutions where we can.
- Act responsibly to protect the environment.
- Act to protect local ecology and biodiversity, improve it where possible and seek ways to reduce our impact on our neighbours.
- Incorporate energy efficiency considerations into our operations.
- Endeavour to be efficient in the use of fuels, materials and water, and seek ways to reduce the amount of waste we generate.
- Lead by example, embracing our vision and values.
- Ensure we understand and comply with all relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

## We never

- Waste environmental resources.
- Allow environmental risks or incidents to go unreported.



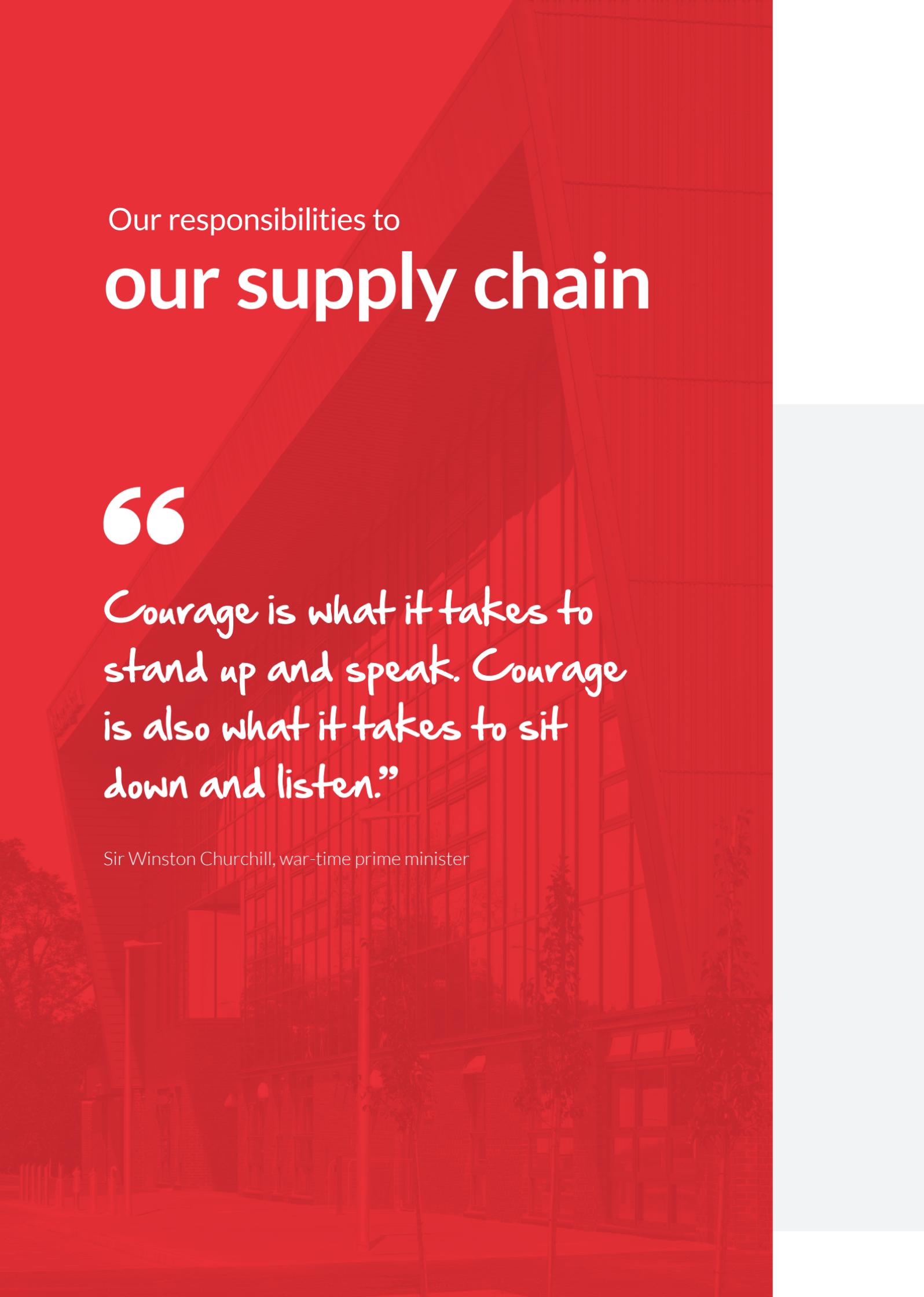
## On site we additionally:

- Ensure suitable, adequate and effective risk assessments and method statements are implemented to protect the environment and biodiversity.
- Plan to effectively manage foreseeable environmental incidents.
- Implement, use and maintain environmental control equipment to avoid environmental harm.
- Play our part in minimising the amount of construction, demolition and excavation waste going to landfill.
- Manage hazardous materials effectively to avoid pollution and avoid contaminating watercourses.
- Provide sufficient resources, including training, where required, to ensure conformance with our policies and standards.
- Ensure staff and our supply chain understand their environmental responsibilities in relation to the work they undertake.
- Supervise, monitor and review site activities in line with our policies and standards.

## How can I find out more?



- Review the process and policies set out in our BMS.
- Speak to the Health, Safety and Environment team.



Our responsibilities to  
**our supply chain**

“

*Courage is what it takes to stand up and speak. Courage is also what it takes to sit down and listen.”*

Sir Winston Churchill, war-time prime minister

## Developing long-term relationships

We are committed to working closely with our supply chain to develop mutually beneficial relationships by promoting our practices and principles, and treating them with fairness, respect, trust and transparency.

### What it means

Building a resilient supply chain is key to achieving our objectives as a business. We are committed to working collaboratively with our supply chain through an approach that consistently demonstrates shared values and excellent behaviours and processes to provide mutual benefit and deliver excellence on behalf of our clients.

### We always

- Select our supply chain in a fair way, based on skill, competence and best value.
- Seek to ensure the relationships we build are effective, optimised and deliver enhanced benefits to all parties.
- Consider sustainability issues in the selection of our supply chain.
- Communicate honestly and transparently.
- Develop strong, sustainable relationships based on trust, shared values and behaviours.
- Follow our procedures on bribery and corruption.
- Avoid conflicts of interest.
- Resolve disputes at the earliest stage.
- Strive to meet contractual obligations.
- Commit to paying our supply chain in line with our mutually agreed contract terms.
- Lead by example, embracing our vision and values.
- Ensure we understand and comply with all relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

### We never

- Share confidential information.
- Hide conflicts of interest.
- Do anything that could compromise competition.



How can I find out more?



- Review the process and policies set out in our BMS.



Our responsibilities to  
**our business**

“

*Strive not to be a success,  
but rather to be of value.”*

Albert Einstein, physicist



# Company records, accounts and reporting

We ensure that we maintain accurate business records and that our financial statements and underlying records are complete and reflect a true and fair view of the state of the business. Our robust system of internal controls has been designed to achieve this.

## What it means

We keep accurate and complete commercial and financial records and have appropriate internal controls in place to achieve this. This is critical to our credibility and reputation and fulfils our legal and regulatory obligations.



### How can I find out more?



- Review the process and policies set out in our BMS.
- Review the Group/divisional Finance Manual.
- Speak to the Group Finance team.

## We always

- Keep accurate and complete records and accounts and report business transactions correctly, fairly and in a timely way.
- Ensure all expense claims and declarations relating to hospitality, gifts or expenses given to or received from third parties are accurately completed.
- Ensure invoices, statements, accounts and other records relating to dealings with clients, suppliers and other business partners are prepared and maintained accurately and completely.
- Ensure that the correct procedures are followed in relation to the incorporation of new companies and, where required, guidance from the Company Secretariat team is sought.
- File all appropriate Companies House returns and tax returns, and make tax payments accurately and on time.
- Lead by example, embracing our vision and values.
- Ensure we understand and comply with regulatory, legislative and corporate governance requirements and all other relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

## We never

- Directly or indirectly falsify documentation, allow it to be falsified, or alter figures, letterheads, dates or signatures on documents in a way that could mislead.
- Misrepresent facts or data or cause anyone with whom we do business to be misled by our actions or omissions.
- Conceal or destroy documentation or records prior to any predetermined period.
- Condone tax evasion or the facilitation of tax evasion in any form.

Our responsibilities to our business

## Dealing in shares

We do not use insider knowledge to our gain or allow it to influence the actions of others when share dealing.

### What it means

In certain circumstances, either by virtue of our day-to-day jobs or as a result of a particular project we are working on, we may gain access to price sensitive information that is not publicly available and which, on publication, would be likely to affect the stock market price of our shares. Using this information to our advantage, or to the benefit of others, is illegal.

Trading shares or securities, asking others to do so on our behalf, or tipping them off even when we do not stand to gain from the deal ourselves is known as 'insider dealing' and is a criminal offence when we are in possession of price sensitive information. It is also a criminal offence for any person to misuse inside information.



### We always

- Inform our line manager/supervisor if we come across inside information and are not already on one of the company's 'insider' lists.
- Respect close periods operated by the Group and ensure our persons closely associated do too.
- Lead by example, embracing our vision and values.
- Ensure we understand and comply with all relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

### We never

- Disclose confidential information about the company, unless we have authorisation to do so.
- Deal in shares or securities, or allow our connected persons to do so while in possession of insider knowledge or when explicitly prohibited to do so.
- Spread false information or participate in any activities that could influence the price of shares in a publicly-listed company.

### How can I find out more?



- Review the process and policies set out in our BMS.
- Speak to the Company Secretariat team.

# Preventing money laundering

We comply with our regulatory responsibilities to anticipate and prevent any Group company being used for money laundering or terrorist financing.

## What it means

Money laundering describes the act of using business activity to conceal money or assets acquired or exchanged by criminal means to give the appearance that they have been legitimately acquired. Money laundering also includes money that is used to fund terrorism, however it is obtained.

We never condone, facilitate or engage in money laundering and ensure we have the relevant controls in place to protect ourselves against money laundering.

## We always

- Remain vigilant to any transaction that could indicate money laundering or terrorist financing.
- Identify and assess risks of the company being used for money laundering and terrorist financing purposes.
- Perform customer checks on plot sales to assess the risk posed by the customer; verify the customer's identity; and check the identity of anyone else the customer may be buying the property for (the beneficial owners).
- Carry out checks on relevant joint venture partners.
- Report all suspicions or knowledge of money laundering or terrorist financing to the Money Laundering Reporting Officer promptly.
- Review and monitor each customer's instructions, transaction and activity on an ongoing basis throughout the relationship with that customer.
- Monitor adherence to our processes and internal controls.
- Lead by example, embracing our vision and values.
- Ensure we understand and comply with all relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.



## We never

- Accept cash payments without prior clearance from the Money Laundering Reporting Officer.
- Discuss any suspicions with the customer or their representatives. To do so would be 'tipping off'.
- Knowingly do business with anyone we believe to be involved in money laundering.
- Conceal or misrepresent money that may be the proceeds of criminal activity.

## How can I find out more?



- Undertake our online anti-money laundering training.
- Review the process and policies set out in our BMS.
- Speak to your Money Laundering Reporting Officer or the Legal team.

Our responsibilities to our business

## Protecting personal data

We take care when recording data about others in all forms. We respect other people's privacy and treat their personal information with confidence. We have all of the necessary controls in place to monitor ongoing compliance with data protection and privacy laws.

### What it means

In the course of our jobs, we may come across personal or confidential information. We must only use this information in the way that has been authorised and in compliance with the Data Protection Act 2018 and GDPR (General Data Protection Regulation), which safeguard and regulate the use of personal data on computerised and manual files. This includes only using and storing such information when we need to, to do our work. It includes names, addresses, phone numbers, dates of birth, national insurance numbers, job titles and photographs or anything that can be linked back to an individual person. We treat this data confidentially and we remember that it could be acquired by the concerned individuals or groups under the Data Protection Act 2018 – even if the information is intended to be private and confidential. Under the Data Subject Request sections of the GDPR and Data Protection Act 2018, we are required to disclose, amend, stop using or even delete information held on individuals if a legitimate request is made.

### We always

- Have the appropriate consent to process personal data and process it fairly, lawfully and in accordance with the rights of data subjects under the Act.
- Source this data solely for specified and lawful purposes, and do so in a manner that is adequate, relevant and not excessive in relation to the purpose for which it is acquired.
- Keep data accurate and up-to-date and delete the data when no longer used in line with the agreed retention period.
- Protect data, both on IT systems and hard copies, against unauthorised or unlawful processing, accidental loss, disruption and damage.
- Keep data secure.
- Ensure data is only ever shared on a need-to-know basis or with the consent of the individual involved.

- Report breaches or suspected breaches of GDPR, as outlined on the next page.
- Lead by example, embracing our vision and values.
- Ensure we understand and comply with all relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

### We never

- Keep data for longer than is necessary.
- Check references without seeking permission beforehand.
- Share personal data with unauthorised parties.
- Transfer data to other countries without adequate protection.



### How can I find out more?

- Undertake our online Data Protection Act, GDPR and cyber security training modules.
- Review the process and policies set out in our BMS.
- Search 'GDPR' on the intranet.
- Speak to the Legal team.

## Key principles of handling personal data

- Lawfulness, fairness and transparency – personal data must be processed lawfully, fairly and in a transparent manner.
- Purpose limitation – it must be collected for specified, explicit and legitimate purposes.
- Data minimisation – it should be adequate, relevant and limited to what is necessary for the purposes for which it is processed.
- Accuracy – reasonable care should be taken to keep the data up-to-date.
- Storage limitation – data should not be kept in a form which permits identification of data subjects for longer than is necessary.
- Integrity and confidentiality – it should be processed in a manner that ensures appropriate security of the personal data.
- Accountability – we should be able to demonstrate compliance with all the key principles above, using appropriate measures.



## Reporting breaches

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes.

GDPR makes clear that when a security incident takes place, you should quickly establish whether a personal data breach has occurred and, if so, take steps to address it immediately. Report any information security incident, providing as much detail as possible:

- To the IT Help Desk by phone on 01455 544 600 or by email via [service.desk@gallifordtry.co.uk](mailto:service.desk@gallifordtry.co.uk).
- To your line manager/supervisor verbally or by email.

Processes are in place for the IT Help Desk to escalate to IT management, HR and the Legal team where required. If personal data is potentially compromised, the General Counsel or Head of Legal must be notified immediately. This may be done by the person reporting (directly or via our whistleblowing line), by the IT Help Desk or by direct contact with IT management.

## Subject Access Requests and requests for information under the Data Protection Act

We have a legal obligation to disclose certain personal information held on individuals if requested in accordance with the Data Protection Act 2018 and General Data Protection Regulation (GDPR) – even if the information is intended to be private and confidential. To protect yourself and the company from complaints and legal action, take care when recording any information within our IT systems and hard copies about other individuals or groups, including existing or potential employees, joint venture or other partners, suppliers, subcontractors and clients. This extends to past, present, future and potential individuals and includes data included within:

- Emails.
- Letters.
- Reports.
- Meeting minutes.
- Database/diary entries.
- File notes.

Our responsibilities to our business

## Company property, resources and information

We take care of company property and resources and use them responsibly, safely, securely and as outlined within our policies. We respect the intellectual property and information belonging to the Group and other organisations and use it in line with laws, policies and procedures.

### What it means

We act responsibly when using company assets, safeguarding them in a manner that befits the property in question. We always take care of company property, including information and intellectual property such as the names of our products and brands, registered trademarks, our inventions, the design and look of our products and the things we write, make or produce.

### We always

- Protect Group property and resources from damage, theft, loss, misuse, fraud and destruction.
- Treat company assets and resources with care, and data confidentially.
- Seek advice from the Legal team when naming new businesses, products or services or when dealing with patents or other intellectual property rights.
- Take care to avoid the indirect disclosure of such information to unauthorised people through overheard conversations or documents that could be viewed.
- Minimise waste and use company property and resources efficiently, as intended by the company.
- Lead by example, embracing our vision and values.
- Ensure we understand and comply with all relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

#### How can I find out more?

- Review the process and policies set out in our BMS.
- Speak to the Legal team.



### We never

- Abuse our privileges or any assets or resources in our possession.
- Use any confidential information from previous employment.
- Use the company's assets or information for personal use, unless agreed with a line manager/supervisor or stated in a Group policy.
- Use unlicensed photos, videos or software.
- Copy documents, reports, videos, software or similar items if we do not hold the copyright to them, unless we have written authorisation to do so.
- Disclose confidential information unless we have written authorisation or share information that could be harmful to the Group and organisations it works with.
- Discuss or share confidential documents or leave them where unauthorised persons may access them.
- Disclose confidential information without consent to any person, firm or other body relating to the affairs of the Group, its suppliers, customers or trade secrets, either during employment by the Group or after termination of employment.



Our responsibilities to our business

## Use of IT

We use our computers, laptops, mobile devices, email, internet and intranet for business and professional use and ensure the security, integrity and confidentiality of all electronic communications and information-based resources.

### What it means

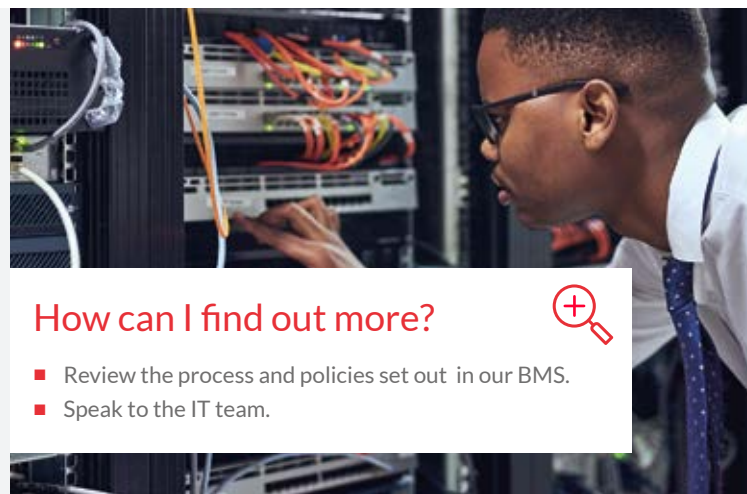
Electronic communications systems such as the internet and email are provided to us for work purposes. The Group has a legitimate interest in safeguarding its assets and reputation against improper conduct.

We take care to maximise our cyber security capabilities and stay safe online. We never use the Group's systems to access, display, store, generate or send to others material which is illegal or may be regarded as offensive. We cannot expect privacy in respect of emails sent or received on the Group's systems, or when using the Group's internet connection.

As corporate information is critical to the organisation's success, it is company property. We should be aware that all company information that is used on company IT devices (or personal devices) is owned by the Group.

### We always

- Use strong passwords and change them periodically.
- Use email responsibly and cautiously, and double-check we are emailing the correct recipient(s).
- Scrutinise the details of the sender of emails we receive and remember that fraudsters can mimic the sender details of people we know.
- Exercise caution when clicking on links or opening attachments within emails.
- Use the appropriate email signature including our name, job title, business unit name, address and relevant contact numbers.
- Forward our emails to a colleague when away or set up an out of office response.



### How can I find out more?



- Review the process and policies set out in our BMS.
- Speak to the IT team.

- Retrieve mail regularly and reply promptly.
- Lock our workstations when away from them.
- Report loss, theft and damage of IT equipment.
- Lead by example, embracing our vision and values.
- Ensure we understand and comply with all relevant laws, policies and procedures.
- Ask if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

### We never

- Abuse or misuse the systems and equipment provided to us.
- Procure or download software, screensavers or other applications without consulting IT.
- Send or forward junk emails.
- Share passwords with other employees.
- Share confidential information outside of the authorised parties.
- Use the Group's systems to access, display, store, generate or send to others material which is illegal or may be regarded as offensive.

# Raising concerns

“

*You must be the change you wish to see in the world.”*

Mahatma Gandhi,  
Leader of the Indian independence movement

## Doing the right thing

As well as having a duty to do the right thing, it is also important for us to speak up if we see or suspect wrongdoing or any breaches of the Code or our policies and procedures. Raising a concern could not only protect the Group and employees from legal action, but it could save lives.

### How to speak up

In most cases, your line manager/supervisor should be your first port of call. If you prefer not to speak with your line manager/supervisor, speak with your department head/director, or liaise with the department specified in the corresponding section of the Code. In the vast majority of situations, these concerns can be resolved informally.

Alternatively, you can raise a concern using our dedicated telephone hotline. The service, known as 'Safecall', is an independent and confidential reporting line that is available all year round.

### What shouldn't I report to a line manager/supervisor?

Concerns relating to bribery, corruption, fraud, money laundering or anti-competitive activity should be reported directly to the General Counsel, Head of Legal or Safecall. They should not be dealt with at project or business unit level. This is because steps can be taken at Group level to protect the business under the relevant legislation. It is important that suspicions are reported quickly to preserve the availability of these protections.

### What can I report to Safecall?

You can use Safecall to report incidents that have taken place or that may take place including:

- Compromises of health and safety, environmental incidents or drugs and alcohol concerns.
- Bribery, corruption, fraud or miscarriages of justice.
- Criminal offences and failure to comply with legal obligations.
- Concealment or misrepresentation of company information.
- Alleged or actual acts of harassment, discrimination, victimisation, bullying, modern slavery or any other acts/omissions where the grievance procedure is felt to be inappropriate.
- Breaches of company policies and procedures or of this Code.

### How can I contact Safecall?

- Call 0800 915 1571.
- Visit [www.safecall.co.uk/report](http://www.safecall.co.uk/report).

### Employee Assistance Programme

The Employee Assistance Programme provides you and your immediate family with the information, resources and options to address a wide range of issues both at home and at work. You can discuss medical concerns, family/relationship issues, legal and financial matters and consumer rights, and access counselling. The confidential hotline is available 24 hours a day, 365 days a year via 0800 0727 072 or visit: [www.axabesupported.co.uk](http://www.axabesupported.co.uk).



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# Doing the right thing

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